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July 6, 2020

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
Manhattan, New York

Re: *United States v Ronald Salguero Portillo*, S5 15 Cr. 379

Dear Judge Castel,

I am writing to advise the Court that Bonnie Klapper, Esquire will very shortly be entering a formal appearance on behalf of Ronald Salguero Portillo and that I will thereafter be moving to withdraw from this case. I was notified by Ms. Klapper that she has been able to arrange a legal telephone call with the defendant at the Metropolitan Correctional Center in the next two days to finalize the matter of representation and that she anticipates immediately thereafter filing her notice of appearance.

As the Court knows, there is a bond motion scheduled in this case for later this morning. After consulting with Ms. Klapper, she has asked me to request an adjournment of one week for the hearing on the pending motion. The prosecutors in this case have been advised of the pending change of counsel and do not oppose the requested continuance. and in this case.

I believe that it would be best for Mr. Ronald Salguero Portillo's permanent counsel to handle this matter before the Court.

For all of these reasons, the defense respectfully requests that this continue the currently scheduled bond hearing.

Respectfully submitted,

*Robert Feitel*

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cc: Daniel Nessim, AUSA via ECF and email  
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Upon the application of defense counsel, which is unopposed by the government, the July 6, 2020 bail hearing is adjourned to July 24, 2020 at 11 a.m. The Court finds that the ends of justice will be served by granting a continuance and that taking such action outweighs the best interest of the public and the defendant in a speedy trial. The Court's reasons for this finding are that the grant of the continuance is needed to permit defendant's new counsel to finalize her representation of him, to discuss the case with him, and adequately prepare for a bail hearing. Accordingly, the time between today and July 24, 2020 is excluded.

SO ORDERED.

July 6, 2020.



P. Kevin Castel  
United States District Judge